

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case  
**20-CA-307439**Date Filed  
**11/17/2022**

## INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Twitter, Inc.		b. Tel. No. 415-222-9670
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 1355 Market Street #900, San Francisco, CA 94103	e. Employer Representative	g. e-mail
		h. Number of workers employed 7,500
i. Type of Establishment (factory, mine, wholesaler, etc.) Technology Company	j. Identify principal product or service Social Media Platform	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 8(a)(3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  
See Ex. A (attached hereto)

(b) (6), (b) (7)(C) ty filing charge (if labor organization, give full name, including local name and number)  
c/o Lichten & Liss-Riordan, P.C.

(b) (6), (b) (7)(C) c/o Shannon Liss-Riordan, Esq. Lichten & Liss-Riordan, P.C. 729 Boylston Street, Suite 2000 Boston, MA 02116	4b. Tel. No. 617-994-5800
	4c. Cell No.
	4d. Fax No. 617-994-5801
	4e. e-mail sliss@llrlaw.com; tfowler@llrlaw.com

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)  
N/A

## 6. DECLARATION

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.

/s/ Shannon Liss-Riordan

Shannon Liss-Riordan

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Address 729 Boylston Street, Suite 2000, Boston, MA 02116

Date 11/17/2022

Tel. No.  
617-994-5800

Office, if any, Cell No.

Fax No.  
617-994-5801e-mail  
sliss@llrlaw.com; tfowler@llrlaw.comWILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

# Exhibit A

Twitter has violated Sections 8(a)(1) and 8(a)(3) of the National Labor Relations Act ("NLRA"), by placing its employee (b) (6), (b) (7)(C) on administrative leave in retaliation for concerted protected activity. On October 27, 2022, Elon Musk completed his acquisition of Twitter. Almost immediately, Musk terminated Twitter's executives and then proceeded to lay off half of the company's workforce. For employees who were not laid off, Musk required that they return to working in the office immediately (with limited exceptions that he needed to personally approve). Prior to Musk's purchase of the company, Twitter employees had been permitted to work remotely during the COVID-19 pandemic. In the summer and fall of 2022, as rumors circulated regarding what would happen to the company if Musk completed his purchase of it, Twitter had promised employees that, should Musk purchase the company, they would be able to continue working remotely for at least a year after the purchase. Following Musk's announcement that he was requiring employees back to the office (thus reneging on the promise that had been made to employees, which had kept many of them from leaving the company during those uncertain months prior to Musk's purchase), employees expressed their concern and outrage over the requirement that they return to the office immediately. Charging party (b) (6), (b) (7)(C) (who was not initially laid off on (b) (6), (b) (7)(C)) was a (b) (6), (b) (7) in a class action lawsuit that was filed on (b) (6), (b) (7)(C) 2022, and amended on (b) (6), (b) (7)(C) 2022, which challenged both the way the mass layoffs were handled, as well as the requirement that remaining employees return immediately to the office. On (b) (6), (b) (7)(C) 2022, charging party (b) (6), (b) (7)(C) posted a message to co-workers suggesting that they respond collectively to protest the return to office policy. On (b) (6), (b) (7)(C) 2022, with no warning and no explanation, charging party (b) (6), (b) (7)(C) was placed on administrative leave and cut off from their Twitter work accounts. Charging party (b) (6), (b) (7)(C) alleges that Twitter placed them on administrative leave in retaliation for being a (b) (6), (b) (7) on the class action lawsuit and posting the message to employees suggesting that they collectively protest the return to work policy.